

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

BRIAN ECKART,

Plaintiff,

vs.

CEREN ERCANTURK, RAISER, LLC,
and UBER TECHNOLOGIES, INC.

Defendants.

) Civil Action No: 2:24-cv-06400-RMG

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**DEFENDANT CEREN ERCANTURK'S
ANSWERS TO LOCAL RULE 26.01
INTERROGATORIES**

AND NOW COMES Defendant Ceren Ercanturk (hereinafter referred to as "Defendant"), by and through her undersigned counsel, and answers the Local Rule 26.01 Interrogatories as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: At this time, Defendant is not aware of any person or legal entity who has a subrogation interest in any of the claims asserted in this lawsuit.

B. As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER: Each claim should be tried by a jury because the parties have requested and/or will request a jury trial.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Defendant is an individual, not a publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C).

ANSWER: Defendant does not challenge the appropriateness of venue in this Division, as the allegations of the Plaintiff's Complaint involve events that are alleged to have occurred in Charleston County.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether the cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Upon information and belief, this action is not related in whole or in part to any other matter filed in this District.

F. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Defendant is properly identified.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Subject to all affirmative defenses and motions or pleadings which may be filed in this case, Defendant is not currently aware of such person or legal entity at this time. Defendant specifically reserves the right to supplement and/or amend her response to this Interrogatory as discovery progresses and to assert any claims or defenses that are supported by the evidence.

H. Parties or Intervenor in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER: Defendant is a resident of the State of California.

Luzuriaga Mims, LLP

s/D. Summers Clarke, II

D. Summers Clarke, II (Fed. Bar No. 10348)

D. Foster Moe, Esq. (Fed. Bar No. 14353)

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Counsel for Defendant Ceren Ercanturk

Date: May 23, 2025

Charleston, South Carolina